

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

KATE DOYLE, et al.)	
)	
Plaintiffs,)	
)	
v.)	Civil No. 17-2542 (KPF)
)	
U.S. DEPARTMENT OF HOMELAND)	
SECURITY,)	
)	
Defendant.)	
_____)	

PLAINTIFFS' MOTION TO AMEND COMPLAINT

Pursuant to Fed. R. Civ. P. 15(a)(2), plaintiffs in the above-captioned case hereby move to amend their complaint to add as a defendant the Executive Office of the President and claims under the Administrative Procedure Act (“APA”), 5 U.S.C. § 706, the Federal Records Act (“FRA”), 44 U.S.C. §§ 2101, *et seq.*, 3010 *et seq.*, and 3301 *et seq.*, and the Presidential Record Act (“PRA”), 44 U.S.C. §§ 2201 *et seq.* The grounds for this motion are set forth in the accompanying memorandum of law in support of this motion.

Plaintiffs also note their understanding that the government is likely to oppose this motion as futile.

Respectfully submitted,

/s/ Anne L. Weismann
Anne L. Weismann
(D.C. Bar No. 298190)
Citizens for Responsibility and Ethics
in Washington
455 Massachusetts Ave., N.W.
Washington, D.C. 20001
Phone: (202) 408-5565

Alex Abdo (AA-0527)
Jameel Jaffer (JJ-4653)

Knight First Amendment Institute at
Columbia University
314 Low Library
535 West 116th Street
New York, NY 10027
Phone: (212) 854-9600
alex.abdo@knightcolumbia.org

Dated: August 30, 2017

Attorneys for Plaintiffs